

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ANNE DE LACOUR, ANDREA  
WRIGHT, and LOREE MORAN  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

COLGATE-PALMOLIVE CO., and  
TOM'S OF MAINE INC.

Defendants.

Civil Action No. 1:16-CV-08364 (KW)

**PLAINTIFFS' NOTICE OF RENEWED  
MOTION FOR CLASS  
CERTIFICATION, APPOINTMENT OF  
CLASS REPRESENTATIVES, AND  
APPOINTMENT OF CLASS COUNSEL**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that, upon the Declaration of Sarah N. Westcot, the Declaration of Colin Weir, the Declaration of J. Michael Dennis, the Declaration of Anne de Lacour, the Declaration of Loree Moran, the Declaration of Andrea Wright, the exhibits attached thereto, and the accompanying Memorandum of Law, Plaintiffs hereby move before the Honorable Kimba M. Wood for an Order, pursuant to Rule 23(b)(3) to : (i) certify a class defined as “all persons who purchased Tom’s of Maine deodorant and/or toothpaste products (“Tom’s Products” or the “Products”) on or after September 24, 2015 in the state of New York (the “New York Class”); (ii) certify a class defined as “all persons who purchased Tom’s Products on or after September 24, 2015 in the state of California (the “California Class”); and (iii) certify a class defined as “all persons who purchased Tom’s Products on or after September 24, 2015 in the state of Florida (the “Florida Class”); (iv) appoint Anne de Lacour, Loree Moran, and Andrea Wright as representatives of the Classes; and (v) appoint Plaintiffs’ counsel, Bursor & Fisher, P.A., as Class Counsel. Plaintiffs hereby request oral argument on the instant motion.

Dated: February 21, 2020

Respectfully submitted,

By: /s/ Joshua D. Arisohn  
Joshua D. Arisohn

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